REMARKS

In response to the Office Action mailed on March 8, 2005, and further to the Examiner's conference of June 2, 2005, between Examiner Saleh Najjar and Christopher J. Lutz (Reg. No. 44,883), Applicant(s) respectfully request(s) reconsideration. Claim(s) 21-46 are now pending in this Application. Claim(s) 32 and 43 have been indicated as being in condition for allowance. Claim(s) 21-22, 33, and 44-46 are independent claims and the remaining claims are dependent claims. In this Amendment, claims 21-22, 33, and 44-46 have been amended and claims 23 and 34 have been cancelled. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Rejection of Claims 21-22, 26-27, 33, 37-38 and 44-46 under 35 U.S.C. §102(e) based on Anupam et al., U.S. Patent 6,687,739:

Claims 21-22, 26-27, 33, 37-38 and 44-46 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,687,739 (Anupam, et al.). Applicant(s) respectfully disagree(s) with these contentions and assert that the present claimed invention is not anticipated by any disclosure in the Anupam '739 reference. The system of the claimed invention is distinguishable from the Anupam '739 system because the Anupam system performs web page operations on a cached copy of the web page in a gateway 312, while the present claims teach a system that modifies the actual web page at an application server 16. The Anupam '739 approach then returns the modified, coped page to a requesting surrogate 304, and then propagates the changes from surrogate to surrogate, apparently in a sequential manner, to avoid downloading from the gateway 312 or www server 320. The present system, in contrast, synchronizes modifications at the original server page, not the copied page, and propagates the changes directly to the user browsers 14, 42, as depicted at page 8, lines 5-7 of the application as filed.

In further detail, with respect to claim 22, the Office Action suggests that Anupam '739 teaches synchronizing access to the copied page. Specifically, the Office Action suggests that Anupam teaches the claimed synchronized access at col. 6, lines 10-20 and at col. 9, lines 25-65. The cited portions of Anupam '739, however, disclose access to the copied page at a cache 314, to avoid burdening the server 320 (Fig. 3). The Anupam request, therefore, includes a translated URL to provide that "the request is first directed to the gateway rather than directly to the intended server" (col. 8, lines 41-42).

In contrast, the present application specifically indicates that the web page operations are sent form the user browser 14, 42 to the content server 12 and to the application server 16 having the original server page for evaluating multiple user access by the server code 18, as described at page 8, lines 5-10, reciting in part: "The operation is sent from user browser 14 or 42 to content server 12 to application server 16 where code 18 is invoked to determine if this is the first copy operation or not." Therefore, the present claim 22 recites a system which performs operations (i.e. modifications such as form fields) on the actual web page, not on a cached copy at a gateway, and SUBSEQUENTLY propagates the changes to the copied pages at the copy server 24 and browsers 14 and 42. The application server code 18 performs blocking operations for concurrent updates based on attempts to access the actual page (page 8, lines 6-7). This differs from Anupam '739, which performs semaphore-type blocking checks at the COPIED page in the gateway, and subsequently updates the actual page only after satisfying concurrency checks with respect to the copied page, as described at col. 8, lines 42-43: "The request is first directed to the gateway rather than directly to the intended server." Therefore, the system of the present invention checks and performs blocking operations on the original, application server 16 version of the web page, not at a copy of the page.

Nonetheless, in an overabundance of caution, applicant has amended claim 22 to recite that the <u>synchronizing includes employing the locator by the</u> <u>first user for modifying the copied page such that the second user is blocked from</u>

<u>modifying the copied page until the modifications performed by the first user are</u> <u>written to the copied page at the copy server from the modified dynamic content</u> <u>page</u>, to further clarify and distinguish the present claims, thus reciting the substance of former claim 23, now cancelled.

Accordingly, it is respectfully submitted that amended claim 22 is now allowable because Anupam '739 does not show, teach, or disclose <u>employing the</u> <u>locator by the first user for modifying the copied page such that the second user</u> <u>is blocked from modifying the copied page until the modifications performed by</u> <u>the first user are written to the copied page at the copy server from the modified</u> <u>dynamic content page</u>, as recited in amended claim 22. Further, claims 33 and 44-46, rejected upon similar grounds, have likewise been amended and are also submitted as now allowable.

Further, the Office Action rejects claim 21 upon similar reasoning as that suggested for the rejection of claim 22. The Office Action indicates that claim 32, dependent on claim 22, contains allowable subject matter. Claim 21 has been herein amended to recite the subject matter of claim 32. Amended claim 21 now teaches features including synchronizing access for operations to the web page, previously recited in both claims 21 and 22, and features for identifying which of the first and second user is modifying the page, as recited in claim 32. Accordingly, it is respectfully submitted that amended claim 21 is allowable.

<u>Rejection of Claims 23-25 and 34-36 under 35 U.S.C. §103(a) based on Anupam et al., U.S. Patent 6,687,739, in view of Kley, U.S. Patent No. 5,862,346:</u>

Claims 23-25 and 34-36 are rejected under 35 U.S.C. §103 as being obvious over Anupam '739. In view of Kley, et al., U.S. Patent No. 6,687,739 (hereinafter Kley '346).

In further detail, with respect to claim 23, the Office Action suggests that Anupam '739, taken in view of Kley '346, teaches blocking a second user from modifying the server web page. Kley, however, is inapplicable to the claimed

system because Kley discloses a hierarchical version history mechanism for maintaining the same, as discussed at col 5, lines 13-15. Accordingly, one skilled in the art would not look to Kley '346 to modify Anupam '739 because Kley teaches a hierarchical versioning tracking system for a series of successive versions. The present claim 23 recites a blocking semaphore-type mechanism for attempted concurrent changes, not for a version history.

Further, as indicated above with respect to claim 22, one of ordinary skill in the art would not look to Kley to modify Anupam because Anupam operates on modifying a cached web page at the gateway server using a translated URL, as disclosed on col. 8, lines 38-40. Additionally, since, as recited above, the claimed system synchronizes changes to the actual web server page, not to a cached gateway copy, even if one were to attempt to modify the Anupam system with the teaching of Kley, the invention defined by the amended claims would still not be realized.

Therefore, it is respectfully submitted that the teachings of Kley '346 do not teach or suggest, alone or in combination, the invention recited in claim 23, now incorporated as amended claim 22. It is respectfully submitted that claim 22 is now in condition for allowance. Claims 33 and 44-46, rejected on similar grounds, have been likewise amended. Further, as the remaining claims depend, either directly or indirectly, from claims 22 and 33, the remaining claims are also believed allowable.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-0901.

-15-

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,

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